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11	Local Counsel for Defendant Trans Union, LLC			
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13	UNITED STATES DISTRICT COURT			
14	NORTHERN DISTRICT OF CALIFORNIA			
15	SAN FRANCISCO DIVISION			
16	NICOLAS A. AGUILAR,) CASE NO. 4:17-cv-00211-JST			
17	Plaintiff,) STIPULATION AND			
18	vs. (PROPOSED) ORDER TO EXTEND ADR DEADLINE			
19	CAPITAL ONE FINANCIAL CORPORATION;) EXPERIAN INFORMATION SOLUTIONS, INC.;)			
20	EQUIFAX INFORMATION SERVICES, LLC; and TRANS UNION, LLC,			
21	Defendants.			
22				
23	Defendants Trans Union, LLC ("Trans Union"), Experian Information Solutions, Inc.			
24	("Experian"), Equifax Information Services, LLC ("Equifax"), Capital One Bank (USA), N.A.			
25	("Capital One"), erroneously sued as Capital One Financial Corporation, and Plaintiff			
26	(collectively, the "Parties"), by their respective counsel, hereby stipulate and respectfully			
27	request that the Court extend the alternative dispute resolution ("ADR") deadline by 60 days. In			
28	support of this Stipulation, the Parties state:			
	STIPULATION AND [PROPOSED] ORDER TO EXTEND ADR DEADLINE – 4:17-CV-00211-JST			
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- 1. This case was filed on January 19, 2017. See Doc. No. 1.
- 2. Pursuant to the Court's Order Selecting ADR Process [Doc. No. 35], the Parties are to complete ADR by June 28, 2017.
- 3. The Parties state that good cause exists to extend the deadline to complete ADR as there has not yet been a Case Management Conference, the Parties are in the early stages of discovery and are continuing to collect information relevant to the case, the Parties are engaging in ongoing settlement discussions, and the Parties have thus far been unable to identify a mediation date on which all Parties and the mediator are available.
- 4. The Parties request that the Court extend the ADR deadline by 60 days so that they may have more time to engage in direct settlement negotiations and conduct necessary discovery before completing ADR.
 - 5. This is the first extension requested by any party.

WHEREFORE the Parties respectfully request that the Court extend the deadline to complete ADR by 60 days.

1		Respectfully submitted,
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3	Date: May 8, 2017	<u>s/ Katherine Carlton Robinson</u>Katherine Carlton Robinson, Esq. (IN #31694-49)(admitted <i>Pro Hac Vice</i>)
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14 15	Date: May 7, 2017	s/ Matthew M. Loker
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20		Attorney for Plaintiff Nicolas Aguilar
21	Date: May 2, 2017	s/ Andrew M. Cummings
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26 27		Attorneys for Defendant EXPERIAN INFORMATION SOLUTIONS, INC.
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2	Date: May 2, 2017	NOKES & QUINN
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9		Attorneys for Defendant EQUIFAX INFORMATION SERVICES LLC
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11	Date: May 2, 2017	s/ Connie Y. Tcheng
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16 17		CAPITAL ONE BANK (USA), N.A.
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